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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

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15 SIDDHARTH HARIHARAN, individually
16 and on behalf of all others similarly situated,

17 Plaintiff,

18 v.

19 ADOBE SYSTEMS INC., APPLE INC.,
20 GOOGLE INC., INTEL CORP., INTUIT
21 INC., LUCASFILM LTD., PIXAR, AND
22 DOES 1-200,

23 Defendants.

Case No.

[Removed from Alameda County Superior
Court Action No. 11574066]

DECLARATION OF RHONDA HJORT IN
SUPPORT OF NOTICE OF REMOVAL
OF ACTION FROM STATE COURT
PURSUANT TO 28 U.S.C. §§ 1331, 1332 &
1441

Date Comp. Filed: May 4, 2011

1 I, RHONDA HJORT, hereby declare:

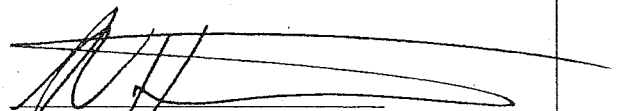
2 1. I am an attorney admitted to practice in the State of California. I am currently
3 employed as Senior Employment and Labor Counsel at Lucasfilm Ltd. ("Lucasfilm"). I provide
4 this declaration in support of Defendants' Joint Notice of Removal of Action from State Court
5 Pursuant to 28 U.S.C. §§ 1331, 1332, & 1441. Unless otherwise indicated below, the statements
6 in this declaration are based upon my personal knowledge or corporate records maintained by
7 Lucasfilm in the ordinary course of business.

8 2. I understand that, in this action, Plaintiff purports to represent a class of individuals
9 described in Paragraph 29 of the Complaint as follows:

10 All natural persons employed by Defendants in the United States
11 on a salaried basis during the period from January 1, 2005 through
12 January 1, 2010. Excluded from the class are retail employees;
13 corporate officers, members of the boards of directors, and senior
14 executives of Defendants who entered into the illicit agreements
alleged herein; and any and all judges and justices, and chambers'
staff, assigned to hear or adjudicate any aspect of this litigation.

15 3. As of May 20, 2011, Lucasfilm has approximately 582 salaried, non-retail employees
16 who reside in the United States. Of those employees, 578 (or 99.3 percent) currently reside in
17 California. Based on my experience at Lucasfilm and knowledge of Lucasfilm's business and
18 organization, I believe that the percentage of salaried, non-retail United States employees who
19 reside in California for the entire class period is not materially different from the percentage of
20 current salaried, non-retail Lucasfilm employees who are California residents. Due to the
21 shortness of time, I have not yet been able to make this determination for the entire purported
22 class period.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct and that this declaration was executed on May 23, 2011 at San
25 Francisco, California.

26 
27 RHONDA HJORT
28